



Office of General Counsel

**MEMORANDUM FOR BRENNAN HART  
ASSOCIATE ADMINISTRATOR FOR  
CONGRESSIONAL & INTERGOVERNMENTAL AFFAIRS (S)**

**FROM: JESSICA JENNINGS  
SPECIAL ASSISTANT  
OFFICE OF CONGRESSIONAL AND  
INTERGOVERNMENTAL AFFAIRS (S)**

**SUBJECT: Recusal Notification**

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of May 18, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients. Further, because I was a registered lobbyist within the two years before the date of my appointment, in addition to abiding by the limitations of paragraph 6 of the Ethics Pledge, I will not for a period of two years after the date of my appointment participate in any particular matter on which I lobbied within the two years before the date of my appointment or participate in the specific issue area in which that particular matter fits.

My former employer is Van Scoyoc Associates. My former clients include, but are not limited to the following companies: Austal USA and the Coalition of EPSCoR States. Additionally, there are clients whose names were not reported on my Public Financial Disclosure Report because they fell below the required reporting threshold as required by Part 4, Filer's Sources of Compensation Exceeding \$5,000 in a Year. Accordingly, I will notify you of my recusal obligation if a matter before me involves an unidentified former client.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

U.S. General Services Administration  
1800 F Street, NW  
Washington, DC 20405  
[www.gsa.gov](http://www.gsa.gov)

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the refusal.

(b) (6)

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cc: Ethics Law Staff



Office of Special Counsel

MEMORANDUM FOR BEN KENNEY  
ASSOCIATE ADMINISTRATOR FOR  
STRATEGIC COMMUNICATIONS (Z)

FROM: JEFFREY LEIERITZ  
SENIOR COMMUNICATIONS ADVISOR  
OFFICE OF STRATEGIC COMMUNICATIONS (Z)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of June 5, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, the Associated Builders and Contractors.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff

(b) (6)

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U.S. General Services Administration  
2000 Power Bldg  
Washington, DC 20548  
202-512-2000



JUL 27 2017

Office of General Counsel

MEMORANDUM FOR CHARLES MANGER  
ASSOCIATE ADMINISTRATOR FOR  
SMALL BUSINESS UTILIZATION (E)

FROM: WILLIAM PETTIGREW  
SENIOR ADVISOR  
OFFICE OF SMALL BUSINESS UTILIZATION (E)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of June 12, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, the Philadelphia Parking Authority.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff

(b) (6)

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Office of General Counsel

**MEMORANDUM FOR TIM HORNE**

**ACTING ADMINISTRATOR (A)  
OFFICE OF THE ADMINISTRATOR**

**FROM:**

**ALAN THOMAS  
COMMISSIONER, FEDERAL ACQUISITION  
SERVICE (Q)**

(b) (6)

**SUBJECT:**

**Recusal Notification**

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of June 26, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employers, Artlin Consulting, Berico Technologies, and ASRC Federal (formerly Data Networks Corporation).

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff



MEMORANDUM FOR BRENNAN HART  
ASSOCIATE ADMINISTRATOR FOR  
CONGRESSIONAL & INTERGOVERNMENTAL AFFAIRS (S)  
[REDACTED] (b) (6)  
CHRISTOPHER AVERILL  
COMMUNICATIONS ADVISOR  
OFFICE OF CONGRESSIONAL AND  
INTERGOVERNMENTAL AFFAIRS (S)  
FROM:  
SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of August 28, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients. My former employer is the New England Council. Further, because I was a registered lobbyist within the two years before the date of my appointment, in addition to abiding by the limitations of paragraph 6 of the Ethics Pledge, I will not for a period of two years after the date of my appointment participate in any particular matter on which I lobbied within the two years before the date of my appointment or participate in the specific issue area in which that particular matter fits.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation. To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff



MEMORANDUM FOR JOHN COOKE  
ACTING REGIONAL ADMINISTRATOR (5A)

FROM: BRADLEY HANSHER  
SENIOR ADVISOR  
OFFICE OF THE REGIONAL ADMINISTRATOR (5A)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of September 5, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, PayLease.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the company identified above, please identify who should handle matters involving the above entitled company that would normally come before me. This person will handle all matters involving the above entitled company and advise all interested parties of the recusal.

cc: Ethics Law Staff

(b) (6)

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**MEMORANDUM FOR BENJAMIN KENNEY  
ASSOCIATE ADMINISTRATOR FOR STRATEGIC  
COMMUNICATIONS (Z)**

**FROM: PAMELA DIXON  
PRESS SECRETARY  
OFFICE OF STRATEGIC COMMUNICATIONS (Z)**

**SUBJECT: Recusal Notification**

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of June 12, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employers, Hesse Martone LLC and Robert Half Legal and the clients listed in the attachment.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

Attachment

cc: Ethics Law Staff

(b) (6)





## **LIST OF CLIENTS**

Employer: Hesse Martone (employer)

Client: AIG

Client: American Council of Engineering Companies

Client: Associated General Contractors of Illinois

Client: Delmar Gardens Enterprises, Inc.

Client: Enterprise Bank & Trust

Client: Garden View Center of Chesterfield

Client: Gateway Region YMCA

Client: Husch Blackwell

Client: Illinois Professional Land Surveyors Assn

Client: Illinois Road & Transportation Builders Assn.

Client: Illinois Society of Professional Engineers

Client: Keller/Charles F.

Client: Missourians for Peter Kinder

Client: City of Olivette

Client: Prairie State Generating Company, LLC

Client: Productive Automation Systems Corporation

Client: Reliant Care Management Company

Client: Southern Illinois Builders Association

Client: Stereotaxis, Inc.

Client: The Principia Corporation

Client: Van Tuyl Companies



JUL 27 2017

Office of General Counsel

MEMORANDUM FOR CHARLES MANGER  
ASSOCIATE ADMINISTRATOR FOR  
SMALL BUSINESS UTILIZATION (E)

FROM: WILLIAM PETTIGREW  
SENIOR ADVISOR  
OFFICE OF SMALL BUSINESS UTILIZATION (E)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of June 12, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, the Philadelphia Parking Authority.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff

(b) (6)

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**MEMORANDUM FOR TIM HORNE**

**ACTING ADMINISTRATOR (A)  
OFFICE OF THE ADMINISTRATOR**

**FROM: ALLISON BRIGATI (b) (6)  
ASSOCIATE ADMINISTRATOR  
OFFICE OF GOVERNMENT-WIDE POLICY (M)**

**SUBJECT: Recusal Notification**

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of July 3, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employers, the National Academy of Public Administration and McEneaney Associates, Inc. and the clients listed in the attachment.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

**Attachment**

**cc: Ethics Law Staff**

### **LIST OF CLIENTS**

Employer: McEneaney Associates, Inc. (employer)

Client: George & Suzanne Folsom

Client: Caroline & Justin Hunter

Client: Diane Basheer

Client: B. William Basheer

Client: Evan & Susan Bayh

Client: Neil Tseng & Amanda Yi-ling Chiu

Client: Michael & Diana Allen



Office of General Counsel

**MEMORANDUM FOR TIM HORNE**  
**ACTING ADMINISTRATOR (A)**  
**OFFICE OF THE ADMINISTRATOR**

**FROM:** ALAN THOMAS (b) (6)  
**COMMISSIONER, FEDERAL ACQUISITION**  
**SERVICE (Q)**

**SUBJECT:** Recusal Notification

As required by paragraph 8 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of June 26, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employers, Artlin Consulting, Berico Technologies, and ASRC Federal (formerly Data Networks Corporation).

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff

U.S. General Services Administration  
1800 F Street, NW  
Washington, DC 20405  
[www.gsa.gov](http://www.gsa.gov)



Debra Zusin - LG &lt;debra.zusin@gsa.gov&gt;

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**Scheduling a call**

12 messages

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**Debra Zusin - LG** <debra.zusin@gsa.gov>  
To: Frank Santella - 2P <frank.santella@gsa.gov>

Wed, Mar 22, 2017 at 9:29 AM

Good Morning,

Do you have time for a call today to discuss your ethics questions? Please let me know a good time for you.

Thank you,

—  
Debra R. Zusin, Esq.  
General Services Administration  
Office of General Counsel  
General Law Division (LG)  
(202) 501-0757  
(202) 208-0085 (fax)

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**Frank Santella - 2P** <frank.santella@gsa.gov>  
To: Debra Zusin - LG <debra.zusin@gsa.gov>

Wed, Mar 22, 2017 at 2:53 PM

Can we do 4PM ? Feel free to call me at (b) (6)

Frank Santella  
Regional Commissioner  
GSA, PBS Northeast & Caribbean Region  
(w) 212-264-4285 (c) (b) (6)  
frank.santella@gsa.gov  
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**Debra Zusin - LG** <debra.zusin@gsa.gov>  
To: Frank Santella - 2P <frank.santella@gsa.gov>

Wed, Mar 22, 2017 at 3:04 PM

I will call you at the 315 number at 4pm. -Debra  
[Quoted text hidden]

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**Debra Zusin - LG** <debra.zusin@gsa.gov>  
To: Frank Santella - 2P <frank.santella@gsa.gov>

Thu, Mar 23, 2017 at 5:27 PM

Good Afternoon,

Thank you for speaking with me yesterday about your seeking and post employment questions. Attached please find relevant information on both topics. As discussed, if more information becomes available to you about a certain situation you have questions about, please feel free to reach out to me to further discuss.

Thank you,

Debra  
[Quoted text hidden]

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**3 attachments** **Key Elements of 207 a-1, a-2 and c.pdf**  
42K

 **Rules of the Road.pdf**  
35K

 **Post Employment Restrictions for Non\_senior Employees.pdf**  
39K

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**Frank Santella - 2P** <frank.santella@gsa.gov>  
To: Debra Zusin - LG <debra.zusin@gsa.gov>

Wed, May 10, 2017 at 8:29 PM

Hi Debra,

I'm seeking your advice again as it relates to seeking employment. As I mentioned in our previous conversation I had posted my resume on a few job-sites and specific web posted positions. Today I heard back via email a request to conduct a phone interview with the (b)(6) I do plan to take the interview and now need your guidance in my agency notification responsibilities. I'd like to respond back to (b)(6) tomorrow morning to agree to the date and time for the interview next week.

I assume your at the activity this week with all the GSA lawyers but hope we could discuss first thing in the morning. This is an entirely new area for me and I want to make sure I get this right.

Please feel free to give me a call anytime on my cell phone (b) (6)

Thanks,

Frank Santella  
Regional Commissioner  
GSA, PBS Northeast & Caribbean Region  
(w) 212-264-4285 (c) (b) (6)  
[frank.santella@gsa.gov](mailto:frank.santella@gsa.gov)

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**Debra Zusin - LG** <debra.zusin@gsa.gov>  
To: Frank Santella - 2P <frank.santella@gsa.gov>

Fri, May 12, 2017 at 10:05 AM

Good Morning,

Apologies for the delay in my response. We were at the OGC National Training Forum and we had little to no reception. (b)(5)

Thank you,

Debra

[Quoted text hidden]

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**Frank Santella - 2P** <frank.santella@gsa.gov>  
To: Debra Zusin - LG <debra.zusin@gsa.gov>

Fri, May 12, 2017 at 11:00 AM

Hi Debra,

Can we connect at 11:30am, please feel free to cal me at (b) (6) if that time is good for you.

Frank Santella  
Regional Commissioner  
GSA, PBS Northeast & Caribbean Region  
(w) 212-264-4285 (c) (b) (6)  
[frank.santella@gsa.gov](mailto:frank.santella@gsa.gov)

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**Debra Zusin - LG** <debra.zusin@gsa.gov>

Fri, May 12, 2017 at 12:12 PM

To: Frank Santella - 2P <frank.santella@gsa.gov>

I am just seeing this now - we had a call with OGE at that time. Any other times work for you today?

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**Frank Santella - 2P** <frank.santella@gsa.gov>

Fri, May 12, 2017 at 12:13 PM

To: Debra Zusin - LG <debra.zusin@gsa.gov>

2:30pm today ?

Frank Santella  
Regional Commissioner  
GSA, PBS Northeast & Caribbean Region  
(w) 212-264-4285 (c) (b) (6)  
[frank.santella@gsa.gov](mailto:frank.santella@gsa.gov)

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**Debra Zusin - LG** <debra.zusin@gsa.gov>

Fri, May 12, 2017 at 12:14 PM

To: Frank Santella - 2P <frank.santella@gsa.gov>

Yes! I will call you then, thanks.

[Quoted text hidden]

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**Frank Santella - 2P** <frank.santella@gsa.gov>

Wed, Jun 21, 2017 at 11:10 AM

To: Debra Zusin - LG <debra.zusin@gsa.gov>

Hi Debra,

I just wanted to keep you updated in regards to my (b)(6) I had my phone interview with (b)(6) on May 25th and just last evening received an invitation for an in-person interview on June 30, 2017. While there has been no GSA activity with (b)(6) since we last spoke I will recuse myself from any business that may develop.

On another note I pushed up my departure from GSA and advised both the Acting Deputy Commissioner and Acting Deputy Commissioner of my intent to leave GSA on 9/30/2017. I did not advise them of my efforts in seeking other employment. I'm guessing there may be other things we will need to do regarding ethics as we get closer to 9/30.

Please let me know if I need to be doing anything as it relates to my departure or seeking employment.

Thanks,

Frank Santella  
Regional Commissioner  
GSA, PBS Northeast & Caribbean Region  
(w) 212-264-4285 (c) (b) (6)  
[frank.santella@gsa.gov](mailto:frank.santella@gsa.gov)

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**Debra Zusin - LG** <debra.zusin@gsa.gov>

Fri, Jun 23, 2017 at 9:10 AM

To: Frank Santella - 2P <frank.santella@gsa.gov>

Good Morning,

(b)(5)

Best wishes,

Debra Zusin



6/23/2017

GSA.gov Mail - Scheduling a call

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## Recusal Notification

5 messages

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**Allison Brigati - M** <allison.brigati@gsa.gov>  
To: Timothy Horne - 8P <tim.horne@gsa.gov>  
Cc: Crystal Nieves - LG <crystal.nieves@gsa.gov>

Fri, Oct 13, 2017 at 5:05 PM

Dear Tim--  
Please see my attached Recusal Notification.  
Thank you.  
Allison

Allison Fahrenkopf Brigati  
Associate Administrator  
Office of Government-wide Policy (OGP)  
General Services Administration  
[202-412-1093](tel:202-412-1093)

---

**Allison Brigati - M** <allison.brigati@gsa.gov>  
To: Timothy Horne - 8P <tim.horne@gsa.gov>  
Cc: Crystal Nieves - LG <crystal.nieves@gsa.gov>

Fri, Oct 13, 2017 at 5:06 PM

Sorry--it did not attach.

Allison Fahrenkopf Brigati  
Associate Administrator  
Office of Government-wide Policy (OGP)  
General Services Administration  
[202-412-1093](tel:202-412-1093)

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**Recusal Notification Allison Brigati.pdf**  
32K

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**Timothy Horne - 8P** <tim.horne@gsa.gov>  
To: Allison Brigati - M <allison.brigati@gsa.gov>  
Cc: Crystal Nieves - LG <crystal.nieves@gsa.gov>

Wed, Oct 18, 2017 at 2:25 PM

Allison,

This is to acknowledge receipt of your Recusal Notification in which you stated that pursuant to paragraph 6 of the Ethics Pledge, you will not, for a period of two years from the date of your appointment (July 3, 2017) participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employers, the National Academy of Public Administration and McEneaney Associates, Inc. and the clients listed in the attachment to the Recusal Notification.

In order to help ensure that you do not participate in matters relating to any of the entities identified in the Recusal Notification, all such matters must be referred to Giancarlo Brizzi, Principal Deputy Associate Administrator for

Government-wide Policy. Please contact Shana Vinson of the Ethics Law Staff at (202) 501-9103 to effectively create a screening arrangement.

[Quoted text hidden]

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**Allison Brigati - M** <allison.brigati@gsa.gov>  
To: Timothy Horne - 8P <tim.horne@gsa.gov>  
Cc: Crystal Nieves - LG <crystal.nieves@gsa.gov>

Wed, Oct 18, 2017 at 2:50 PM

Thank you Tim

Sent from my iPad

[Quoted text hidden]

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**Crystal Nieves - LG** <crystal.nieves@gsa.gov>  
To: Shana Vinson <shana.vinson@gsa.gov>

Wed, Oct 18, 2017 at 3:09 PM

FYI

[Quoted text hidden]

--

Crystal M. Nieves  
Assistant General Counsel  
Ethics Law Staff - General Law Division  
U.S. General Services Administration  
Office: 202-357-9568  
Fax: 202-501-1944

#### CONFIDENTIALITY NOTICE:

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